



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

April 26, 2012

LU-9J

Mr. Michael Gerdenich  
Environmental Health and Safety Team Member  
BASF Corporation  
1609 Biddle Avenue  
Wyandotte, Michigan 48192-3729

Re: Corrective Measures Study, BASF North Works, Wyandotte, Michigan  
U.S. EPA I.D. #: MID 064 197 742

Dear Mr. Gerdenich:

This letter serves as notice for the BASF Corporation (BASF) to complete the Corrective Measure Study Report (CMS) in accordance with the Resource Conservation and Recovery Act 3008 (H) Administrative Order on Consent V-W-011 '94 dated February 1994 (AOC), for the BASF North Works facility in Wyandotte, Michigan (North Works). EPA has concluded that BASF can perform all tasks necessary to evaluate and select an appropriate remedy to address releases of hazardous constituents impacting soil and groundwater and other environmental media at this time. To prepare for this task, BASF has previously completed a number of studies and investigations that were necessary in order to characterize the nature and extent of contamination and the associated risk to human health and the environment.

The purpose of the CMS is to develop and evaluate corrective action alternatives and to recommend corrective measures that BASF proposes to take at North Works. Attachment III of the Order provides CMS detail, requirements and scope of work criteria. I have included with this letter an inventory of constituents that, at a minimum, BASF must address as part of BASF's remedy selection. These constituents represent what BASF identified as constituents that BASF should further investigate as a part of a CMS as concluded in BASF's 2008 Tier II Risk Evaluation Summary Report. BASF must submit the CMS Work Plan for EPA review and approval within 60 days from receipt of this letter. BASF can update or modify any previously submitted partial workplan(s) and make the partial workplan(s) a component of this current CMS Work Plan based on BASF's enhanced understanding of the site conditions.

Should you have any questions or concerns, please contact me at (312) 886-6010, weekdays between 8:30 am - 5:00 pm. EPA looks forward to your continued cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Juan Thomas".

Juan Thomas  
Project Manager

Enclosure

cc: Rich Conforti, MDEQ  
Dave Slayton, MDEQ

Suggested Inventory of Groundwater Monitoring Program Constituents for BASF Northworks as Concluded from BASF's Tier II Risk Analysis

mercury

CN

arsenic

selenium

lead

antimony

nickel,

chromium

zinc

barium

thallium

PAHs

methylphenols

benzene

toluene

chlorobenzene

xylene

1,2-dichloroethane

1,2-dichloropropane

bis(2-ethyhexyl) phthalate

bis(2-chloroethyl) ether

bis(2-chloroisopropyl)ether

pentachlorophenol

4,4'DDT

ethylbenzene

vinyl chloride

dibenzofuran

1,4-dioxane

phenol